

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: LENARD V. UMBERGER
AND JOANN A. UMBERGER**

CHAPTER 13

DEBTORS

CASE NO. 17-12067 JDW

**OBJECTION TO PROOF OF CLAIM FILED BY
ONEMAIN FINANCIAL SERVICES, INC. [CLAIM NO. 1]**

COME NOW the above-named debtors, by and through their attorney of record in this case, and objects to the Proof of Claim filed in this case by Portfolio Recovery Associates, LLC and in support hereof respectfully shows unto the Court the following:

1. Portfolio Recovery Associates, LLC filed a proof of claim as a secured creditor in the amount of \$770.32 original being in the Court file.
2. The claim fails to include evidence the creditor has a perfected security interest in any of the collateral of the estate. Therefore, the claim should be treated as unsecured.
3. The claim of Portfolio Recovery Associates, LLC should be treated as an unsecured claim or wholly disallowed and paid \$0.00 through this plan, or the amount already paid.
4. Other grounds to be shown at the hearing.

WHEREFORE, the debtor prays of the Court that this Objection be received and filed, and at the hearing hereon the debtor's Objection be sustained, and for such other, further and general relief to which the Debtor may be entitled.

This the 3rd day of November, 2017.

/s/Robert H. Lomenick
KAREN B. SCHNELLER, MSB 6558
ROBERT H. LOMENICK, JR., MSB 104186
SCHNELLER & LOMENICK, P.A.
126 NORTH SPRING STREET
POST OFFICE BOX 417
HOLLY SPRINGS, MS 38635
662-252-3224/karen.schneller@gmail.com

CERTIFICATE OF SERVICE

I, Karen B. Schneller/Robert H. Lomenick, attorney for the Debtor, hereby certify that a copy of the foregoing objection to proof of claim has this day been served upon the Chapter 13 Trustee, the U.S. Trustee and Onemain Financial Services, either by electronic means or by United States Mail.

Portfolio Recovery Associates, LLC
Post Office Box 41067
Norfolk, VA 23541

Ms. Locke D. Barkley
Chapter 13 Trustee
6360 I-55 North, Suite 140
Jackson, MS 39211

Office of U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39201

This the 3rd day of November, 2017

/s/Robert H. Lomenick

KAREN B. SCHNELLER
ROBERT H. LOMENICK